

Dear GMUG Planning Team:

Thank you for the opportunity to comment on the working draft of the GMUG Forest Plan. We greatly appreciate your intent to gather public input by releasing a working draft to the public and hosting multiple open house events around the region.

As a local chapter of a national organization, the Northern San Juan Broadband (NSJBB) of Great Old Broads for Wilderness appreciates your consideration of these comments in addition to the comments to which we contributed and signed on submitted by Matt Reed (High Country Conservation Advocates) on behalf of our coalition of organizations. NSJBB represents over four hundred supporters residing within the GMUG region including dozens of businesses and numerous non-profits.

### **Management Areas**

From the beginning of the planning process, NSJBB has participated in on-the-ground surveying, crafting narratives, identifying boundaries, and educating and gleaning support from elected officials, businesses, diverse stakeholders and the general public for the Community Conservation Proposal (CCP.) Locally, the CCP is supported by Ridgway Town Council, Ouray Trails Group, Uncompahgre Watershed Partnership, Lariat Saddle Club, Black Canyon Audubon Society, and Community Spirit Church. We have presented to (and continue to confer with) Ouray County Commission, Ouray Climbing Alliance, Ridgway Area Trails, Outdoor Alliance, Colorado Parks and Wildlife, and Colorado Department of Transportation.

Regarding your specific mapped areas related to Management Areas 1.2 (Recommended Wilderness,) we concur with and commend your categorization of the additions to the Mount Sneffels Wilderness and Lizard Head Wilderness consistent with the Colorado Outdoor Recreation and Economy (CORE) Act currently being considered in Congress. However, we disagree with the categorization MA 5 (general forest) of lands near or adjacent to Highway 550 in Ouray County – namely (as referenced in the CCP) Bear Creek, Hayden Mountain, and Abram Mountain. As documented in the CCP and ensuing wilderness inventory and evaluation comments, these polygons possess wilderness qualities and should be categorized/mapped accordingly. A prior email to the GMUG planning team from me indicates how these landscapes were part of the Uncompahgre Primitive Area (which has been dissolved) and therefore not analyzed under the Roadless Rule, in effect resulting in their being left without any protected status. This forest plan revision constitutes a unique opportunity to rectify this oversight and provide the protection these areas warrant due to their natural resource values and opportunities for solitude and primitive recreation. We recommend Bear Creek along with the Baldy Roadless Area as additions to the Uncompahgre Wilderness, Hayden Mountain as stand alone wilderness, and Abram Mountain as a Special Interest or Management Area due to its acreage not meeting the size requirement for wilderness. These areas are our priorities consistent with our organization's mission.

Given expanding population, increased recreation use and climate change, this revised forest management plan must ensure ecosystem integrity and resiliency into the distant future. The CCP enhances protection of watersheds, wildlife habitat and corridors, plant biodiversity and forest health while continuing to provide access for recreation and agricultural uses that drive our local economy. By protecting these landscapes, we also support the continuation of innumerable ecosystem services including, but not

limited to, air and water quality, carbon sequestration, and pollinator survival. At an absolute minimum, the Baldy and Bear Creek additions to the Uncompahgre Wilderness should be categorized as MA1.2. Hayden Mountain, if not categorized as MA1.2, surely qualifies for Wildlife Management Area (MA 3.2) given the Canada Lynx habitat and critical elk production area coupled with black bear and mule deer habitat. The Hayden polygon also functions as a wildlife corridor and linkage.

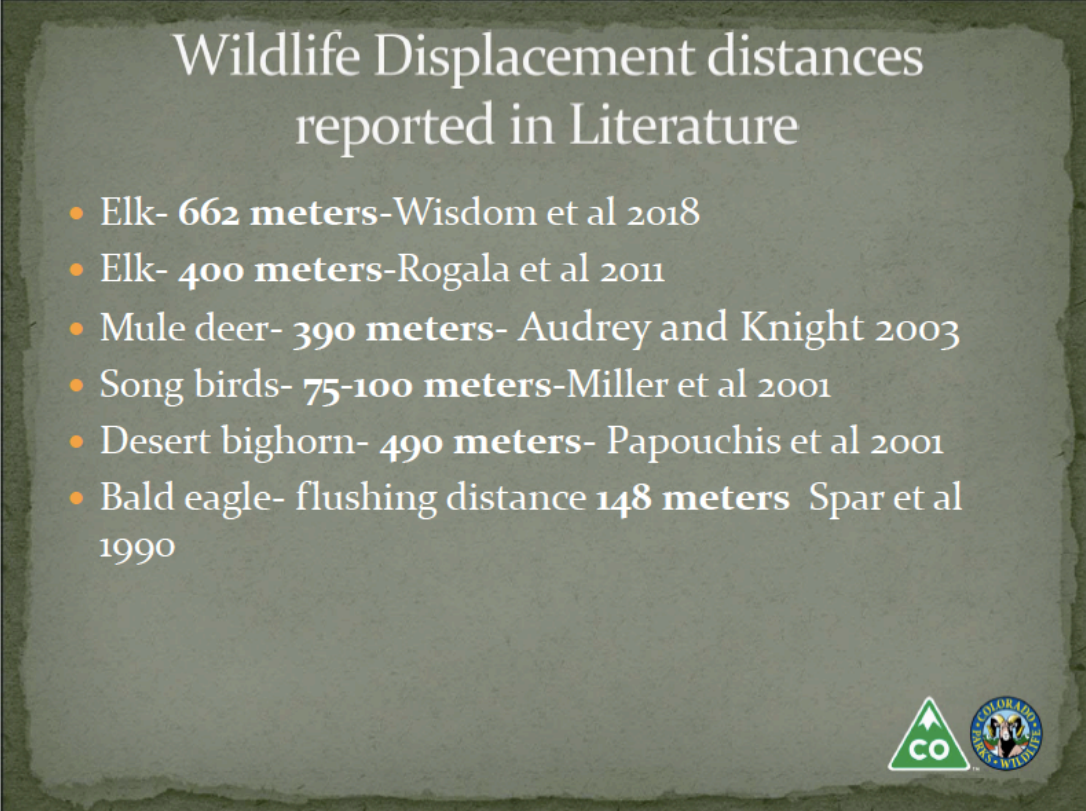
We appreciate MA-STND-WLDN-10 prohibiting drones in designated wilderness and we request this standard be enforced through education and regular monitoring.

We like the idea of Wildlife Management Areas MA 3.2 and though MA-STND-WLDF-01 provides some protections, we recommend more prescriptions that could include among others:

- prohibition of drones
- limits on motorized and mechanized use
- seasonal closures when necessary
- dogs on leash
- group size limits
- restrictions on livestock grazing
- restrictions on infrastructure



We also note that one mile of trail per square mile constitutes a greater density threshold than science would recommend for the health of wildlife. We recommend your review of the following:

- Larson et al (2016) Literature review of 274 studies regarding trail impacts on wildlife plus



Wildlife Displacement distances reported in Literature

- Elk- 662 meters-Wisdom et al 2018
- Elk- 400 meters-Rogala et al 2011
- Mule deer- 390 meters- Audrey and Knight 2003
- Song birds- 75-100 meters-Miller et al 2001
- Desert bighorn- 490 meters- Papouchis et al 2001
- Bald eagle- flushing distance 148 meters Spar et al 1990

Under MA 4.2 High Use Recreation Areas, we recommend MA-OBJ-HIREC-02 include Mount Sneffels Wilderness and specifically the Blue Lakes Trail/lower lakes as a priority area. As you know, Blue Lakes was identified as a Hot Spot by the Boulder-based Leave No Trace Center for Outdoor Ethics and received attention during the 2018 season. Our chapter of Great Old Broads for Wilderness partners with the Ouray District to solitude monitor the Blue Lakes Trail (along with 4 other trails.) All the data from 2017 and 2018 is available from the District. To offer one notable report, on July 3, 2017, 237 people were encountered on the Blue Lakes Trail within the wilderness boundary over a 4.5 hour period and approximately 360 people total were encountered from the trailhead during the surveyors hike (including non-wilderness portion of trail.)

### **Forest Wide Direction**

Though we understand the need for adaptive management in these uncertain, ever-changing times, we are well aware that this approach coupled with limited human and financial resources at USFS, inevitably allows for negative impacts to natural resources which then will be mitigated after the fact. Generally, we do not support this reactive management approach, and would recommend a more proactive direction in many aspects of the plan.

To that end, we feel a need for standards to replace guidelines in many instances including but not limited to:

- Air Quality: FW-AQ-GDL-08
- Riparian Management Zones: pages 19 & 20 GDL-RMGD-10, GDL-RMGD-12 GDL-RMGD-20. Though we appreciate STND-RMGD-09, which would prohibit clear cutting in riparian management zones, additional restrictions are recommended as there are many other logging practices that should not occur in RMZ.
- Species (General): FW-GDL-SPEC-07
- Big Game Species: GDL-SPEC-17 Page 27: STND-SPEC-15
- Boreal Toad: GDL-SPEC-19
- Canada Lynx: As written, the working draft does not provide the necessary standards and protections required by the Endangered Species Act. This topic is thoroughly addressed in our coalition comments and we refer you to those comments (II. G. 1a.)

We support STND-SPEC-15 (page 27) to separate Bighorn Sheep from domestic sheep. We would further request and strongly recommend that, although not required by the planning rule, the GMUG planning team conduct a suitability analysis for livestock grazing. Our members repeatedly observe the spatial and/or temporal proximity of domestic and Bighorn in the Uncompahgre Wilderness. For example, during September 2017, two ewes were observed south of Wetterhorn Peak adjacent to the Ridge Stock Driveway where domestic sheep had recently grazed as evidenced by the depletion of forage, widespread feces, and proximity of a large flock south of this location. Similarly, domestic sheep allotments exist in the South Fork of Bear Creek near Engineer Pass and the upper Middle and East Forks of the Cimarron, which are all known Bighorn habitat.

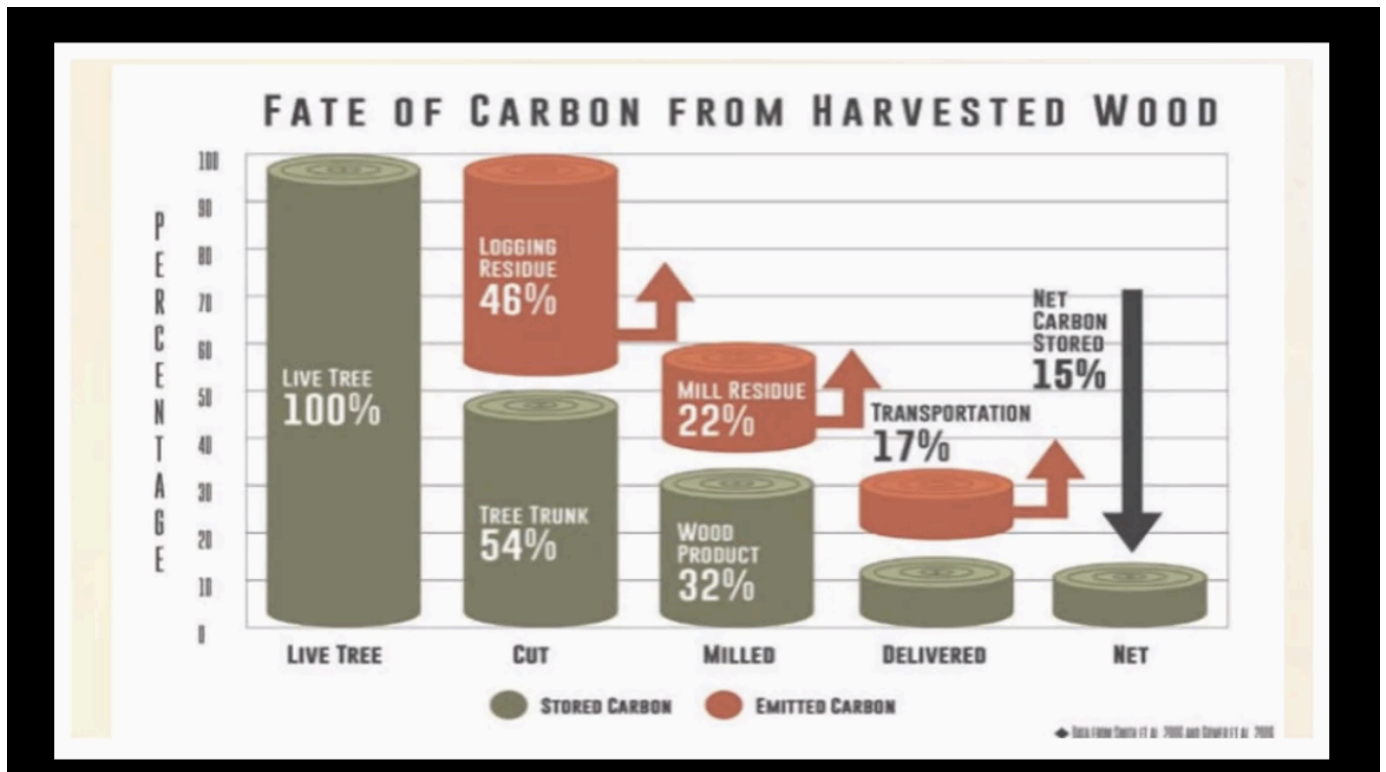
## Climate change

We understand that under the 2012 Forest Planning Rule and the Forest and Rangeland Renewable Resources Planning Act, climate change must be addressed in the planning process. We feel this aspect of the plan is very weak and lacks specificity or direction. We recommend that throughout the forest plan from the vision to management standards, the planning team “account for the effects of global climate change on forest and rangeland conditions, including potential effects on the geographic ranges of species, and on forest and rangeland products.” 16 U.S.C. 1602 (5)(F)

A recent webinar regarding forest health and climate offered these recommendations and graphic that I found relevant to the GMUG planning process as it relates to climate impacts.

### How to increase carbon sequestration and storage on the National Forests:

- 1) Prohibit commercial logging of mature, native, and old growth forests.
- 2) Expand buffer zones around rivers, streams and wetlands.
- 3) Use prescribed fire, instead of logging, to move plantation areas toward a more natural structure.
- 4) Treat wildfire as an ecologically important stage of forest development; cease manipulating public fear of fire to sanction logging.
- 5) Restore old, deteriorating roads to improve watershed health and improve wildlife connectivity.



**Monitoring**

Given the planning teams direction toward adaptive management, consistently applied, reliable, thorough monitoring protocols coupled with routine on-the-ground surveys are essential to maintaining the health and integrity of ecosystems regardless of how they are categorized in the plan. We find this section of the working draft to be totally inadequate to protect natural resources on the forest. We support the recommendations listed in the coalition comments and refer you to section IV. Monitoring of that document.

Finally, we want to once again highlight Bear Creek –both the main creek and S. Fork – as eligible for Wild and Scenic River recommendation. Please refer to comments submitted by Great Old Broads for Wilderness as part of the W & Scenic process.

Thank you again for the opportunity to share our feedback and offer our recommendations. We appreciate and look forward to continuing our collaboration during this plan revision process.

Robyn Cascade, Leader  
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 Great Old Broads for Wilderness